



## Polasáí agus Nósanna Imeachta/Policies and Procedures

Code	QA300
Title	Treasury Management
Policy Owner	Bursar
Date	18/12/2023 (previously 28 <sup>th</sup> June 2023)
Approved By	Údarás na hOllscoile

### 1.0 Purpose

To ensure that all University funds are managed in accordance with current best practice and that relevant procedures are clearly articulated for the benefit of, and compliance by, all impacted by this policy.

### 2.0 Description

- 2.1 The University will ensure that its funds are received and banked in a timely manner, are readily available to meet properly authorised and approved commitments as they fall due, and that the security, movement and application of its funds is properly authorised and controlled.
- 2.2 All movement of funds shall operate so as to optimise benefit to the University in terms of security, return, and liquidity. In particular, the provisions of the Late Payment in Commercial Transactions Regulations 2002 as updated from time to time shall be adhered to so as to minimise interest and penalties for late payment of suppliers, (if any).
- 2.3 Having successfully bid under a public tender process, **Bank of Ireland is the University's principal Banker** although other banks may be used from time to time to transact University business.
- 2.4 The University shall take external professional advice from time to time regarding its Treasury and Investment activities.
- 2.5 The University will organise and draw down borrowing and overdraft facilities in compliance with the framework for borrowing and loan guarantees, as set out in section 38 of the Universities Act 1997.
- 2.6 The University will comply with all relevant legislation pertaining to receipt, movement, and banking of funds. Evidence or suspicion of money laundering or terrorist financing that come to the attention of University management will be reported to An Garda Síochána under the Criminal Justice (Money Laundering & Terrorist Financing) Act 2010.



### 3.0 Responsibilities

Name (Office or position)	Responsibility
Bursar	Policy owner Overall responsibility for the Treasury management function.
Director Financial Accounts	Under the direction of the Bursar is responsible for the receipt and banking of University funds and for all payments to third parties on foot of properly authorised documentation or electronic media as appropriate
Pensions & Investments Officer	Under the direction of the Bursar, is responsible for the recording, management, benchmarking, and reporting on a monthly basis, of cash flow position and the movement of funds between various University Bank and Investment accounts

### 4.0 Approvals

- 4.1 The authorisation and signatures of the President and Bursar are required to open or continue operation of one or more bank accounts in the name of the University for the purposes of investment and disbursement of University funds. Their signatures only, must be applied to the relevant bank's "account opening" documentation.
- 4.2 University nominated bank accounts that have completed their pre-designated term or that are no longer required for investment or operational purposes may be closed at the discretion of the Bursar on advice from the Director Financial Accounts or the Pensions & Investments Officer. Any funds remaining in an account to be closed must be transferred to another University nominated bank account.
- 4.3 A resolution of the Governing Authority is required in order to change the authorised signatory arrangements at any of the University banks. Current bank resolutions are attached as follows: -
- Attachment 1 General Mandate – also details cheque signatories
  - Attachment 2 Facsimile Signature (inked signature plate)
  - Attachment 3 Electronic Fund Transmission System (EFTS)
  - Attachment 4 Fax, Telex or Verbal Instructions
  - Attachment 5 BOI's 'Business-on-Line' (internet banking)

A resolution of the Governing Authority is not required in order to change the following, included for information purposes in the attachments hereto:

- Attachment 6 BOI's 'Business-on-line' access levels for staff



Attachment 7 Bank payments processed by Fexco on behalf of University of Galway, listed operators and approvers

Attachment 8 Bank Deposit and Investment limits

- 4.4 The Pensions & Investments Officer and the Director Financial Accounts are authorised to place on deposit and transfer funds within the University's bank accounts in the various institutions and in accordance with the limits specified in Attachment 6 herewith.
- 4.5 University nominated Banks are authorised to honour and negotiate all cheques and other negotiable instruments drawn, made, endorsed or accepted on behalf of the University and to act on all instructions relating to the accounts, affairs or transactions of the University, notwithstanding that such action may lead to borrowing or cause any of the accounts to be overdrawn or any overdraft to be increased provided that they are signed on behalf of the University in accordance with the detailed instructions laid out in the attachments hereto.



5.0 Procedures and Attachments – see Appendix 1 below - **not for publication**

**Appendix 1**

**Section 5 – Procedures & attachments**

Procedures to be followed by University staff in implementation of this Treasury Management Policy:

- 5.1 All documentation such as notifications, correspondence, invoices, and bills pertaining to payment of monies to the University shall be forwarded by the relevant office to the Financial Accounts Office for reconciliation to bank records, for recording in finance systems, for cash flow monitoring, and for application of financial control procedures.
- 5.2 In accordance with the limits set out in Attachment 6 and based on records of cash, bank, investments, and other relevant liquid assets balances and movements, the Pension & Investment Officer or Director Financial Accounts will, having obtained a minimum of three quotations, place University monies on deposit with approved financial institutions. University Funds may similarly be invested in Government Stocks, Gilts and other Blue Chip investments as approved by FRC and Údarás na hOllscoile.
- 5.3 The Pensions & Investments Officer will keep a record of quotations received and investment and fund deposit ‘deals’ entered into on behalf of the University and will maintain such records for audit purposes.
- 5.4 The Pension & Investment Officer will prepare a monthly report for presentation to the Bursar detailing all cash received and expended, monies placed on deposit and interest earned thereon.
- 5.5 The Pensions & Investments Officer, in conjunction with the Management Accounts Office, will prepare an annual cash flow forecast, based on the University’s approved operating and capital budgets for the forthcoming year and a forecast for the next four financial years, aligned to the University five year financial and strategic plans. This cash flow forecast will be tabled for approval by Finance Resource Committee at the same time as the operating and capital budgets (or as soon as practical thereafter) together with quarterly reports of actual versus forecast flows.
- 5.6 All University bank account balances as recorded in bank’s documentation shall be reconciled to the University’s record in the General Ledger on a monthly basis. All such reconciliations shall be approved by a senior accountant within the Financial Accounts Office who is not involved in the day to day administration of the reconciled account – such approvals will be evidenced and maintained for audit purposes.
- 5.7 The University has Crime Insurance with a Limit of Indemnity of in excess of €4,000,000 in the aggregate.
- 5.8 The Pensions & Investments Officer will maintain a suitable record of all University bank accounts which records the account number, the currency, the date of opening, the date of closure, and the corresponding General Ledger account.
- 5.9 Bank Payment and International Transfer Procedures;  
Under Resolution number 5 herewith, ‘Authorised Users’, may use Bank of Ireland’s internet solution “Business-on-Line” to:
  - a) establish beneficiaries and
  - b) initiate payments to those beneficiaries in accordance with mandate number 5 and attachment number 7 herewith.



5.10 In accordance with attachment number 8 herewith, nominated senior staff in the Bursar's Office may authorise supplier and similar payments to domestic and overseas beneficiaries (mainly suppliers to the University) under contract arrangements with Fexco bank and similar currency dealers subject to their being registered with and authorised by the Central Bank of Ireland at the relevant transaction date.

## 6.0 Petty Cash

6.1 The vast majority of suppliers are happy to accept University Purchase Orders for goods or services, hence, the requirement for petty cash is minimal. Subject to strict compliance with Procurement Regulations, University units may maintain a petty cash float to defray small value items of expenditure where they could not be procured by Purchase Order. **Individual items of expenditure should not exceed €50.**

6.2 Any unit requiring the use of Petty Cash may not hold more than €50. Where a budget holder requires a float in excess of the policy maximum a written request must be made to the Director Financial Accounts or Bursar for consideration and authorisation if appropriate.

6.3 A secure cash box shall be procured for the purpose of storing a petty cash float and it shall be kept locked in a secure location.

6.4 Petty cash floats shall be operated on the "imprest" system, i.e. a written or computer record of each receipt and disbursement shall be maintained so as to record the running balance. Where the float is exhausted or reduced to a low level, it may be replenished to the full float value of €50.

6.5 Replenishment shall be made by completion of the relevant form (Appendix B: Petty Cash Procedure).

6.6 Expenditure incurred must be fully coded and analysed on the form and where appropriate a justification of the expenditure or the amount of expenditure should be included. At a minimum, this should be done on an annual basis in advance of the financial year-end i.e. 30<sup>th</sup> September each year so that expenditure incurred can be recorded in the correct financial year under the correct expenditure account codes. The budget holder must keep the original receipts for a minimum of seven years for audit purposes.

6.7 The Bursar's office reserve the right to perform spot checks on petty cash floats, receipts and records. Failure to comply with the University's policy and procedure on petty cash will result in the facility being removed and budget holders may be requested to reimburse the University for inappropriate use of University funds.

## 7.0 Money Laundering

7.1 Money laundering is commonly understood to refer to the processes by which criminals pass the proceeds of their criminal activity through legitimate financial systems to make the money appear to be "clean" or unrelated to crime. The legal definition of money laundering is much more far-reaching and includes acquiring, possessing, or using, the proceeds of criminal conduct as outlined below.

7.2 The University requires its staff amongst other things:

- (a) to take reasonable steps to know the source of all funds they present for lodgement or cause to have credited to University designated bank accounts.
- (b) to retain original documentation (or copies thereof) relating to transactions giving rise to credits to University bank accounts or additions to University property and assets.



- 7.3 The offence of money laundering is defined in Section 31 CJA as amended by Section 21 of the Criminal Justice (Theft and Fraud Offences) Act 2001. According to the amended Section 31 CJA:

*“a person is guilty of money laundering if, knowing or believing that property is or represents the proceeds of criminal conduct or being reckless as to whether it is or represents such proceeds, the person, without lawful authority or excuse (the proof of which shall lie on him or her)-*

*(a) converts, transfers or handles the property, or removes it from the State, with the intentions of:*

- (i) concealing or disguising its true nature, source, location, disposition, movement or ownership or any rights with respect to it, or*
- (ii) assisting another person to avoid prosecution for the criminal conduct concerned, or*
- (iii) avoiding the making of a confiscation order or a confiscation co-operation order (within the meaning of section 46 of this Act) or frustrating its enforcement against that person or another person,*

*(b) conceals or disguises its true nature, source, location, disposition, movement or ownership or any rights with respect to it, or*

*(c) acquires, possesses or uses the property.”*

- 7.4 *“Criminal Conduct”* includes all conduct which constitutes an indictable offence or, where the conduct occurs outside the State, would constitute such an offence if it occurred within the State and also constitutes an offence under the law of the country or territorial unit in which it occurs, and includes participation in such conduct.

*A person is deemed to be ‘reckless’ if ‘they disregard a substantial risk that the property handled is stolen, and for those purposes, ‘substantial risk’ means a risk of such a nature and degree that, having regard to the circumstance in which the person acquired the property and the extent of the information then available to them, its disregard involves culpability of a high degree.*



## **Attachment 1**

### **General Mandate - Banking Facilities - Resolution approved at Governing Authority (Údarás na hOllscoile) on 18th December, 2023.**

It was resolved that:

1) The authorisation and signatures of both the President and Bursar are required to open and to continue operation of one or more bank accounts, in the name of the University, for purposes of investment and disbursement of University funds.

2) Banks are hereby authorised to honour and negotiate all cheques and other negotiable instruments drawn, made, endorsed or accepted on behalf of the University and to act on all instructions relating to the accounts, affairs or transactions of the University, notwithstanding that such action may lead to borrowing or cause any of the accounts to be overdrawn or any overdraft to be increased provided that they are signed on behalf of the University in accordance with the following instructions:

a) Six Senior Officers are authorised to sign cheques and/or payment orders as follows:

Group A: President, Bursar and Director Financial Accounts

Group B: Pension and Investment Officer, Director Financial Planning and Director of Planning and Administration (Presidents Office)

b) Cheques must be signed in line with the following authorisation limits:

**Payments up to €5,000**

Any one signature from Groups A or B

**Payments between €5,001 - €500,000**

Any two signatures from Groups A or B

**Payments above €500,001**

Two signatures from Group A

c) Written instructions for withdrawals or money transfers to beneficiaries other than University of Galway designated bank or investment accounts

**Payments up to €1,000**

Any one signature from Groups A or B

**Payments between €1,001 - €500,000**

Any two signatures from Groups A or B

**Payments above €500,001**

Two signatures from Group A





d) In line with existing practice, fund transfers between University's accounts (only) may be instigated and authorised using phone/fax/email, by the Pensions & Investments Officer or Director Financial Accounts.

- 3) A list of the officials authorised to sign as per the signing instructions is set out in paragraph 5) below, together with their specimen signatures and the Bank is to be given notice in writing, signed by the then Bursar of the University and any one of the Authorised Signatories (set out in paragraph 5), of any change which may occur from time to time in the list of Authorised Signatories.
- 4) The Resolution shall be communicated to the Bank and shall remain in full force until an amending Resolution shall be passed by the University and a copy thereof certified by the then Secretary of the University.
- 5) The list of authorised signatories and specimens of their signatures are as follows: -

Ciarán Ó hÓgartaigh  
President

Sharon Bailey  
Bursar

Aoife Tuohy  
Director Financial Accounts

Triona Lydon  
Pension & Investment Officer

Adrian Burke  
Director Financial Planning

Deirdre Kerans  
Director of Planning & Administration (President's Office)

I certify that this is a true copy of the Resolution passed at a meeting of Údarás na hOllscoile of University of Galway held on **18th December 2023**.

Secretary for Governance and Academic Affairs:  Date: 22/1/24

## Attachment 2

### Banking Facilities - Resolution 2 - Facsimile Signature (inked signature plate)

It was resolved:

1. That in relation to the mandate under resolution dated the 18th December, 2023 regarding payment of cheques drawn on the accounts of the University, the Bank is hereby instructed to honour and debit to the appropriate account of the University \*(whether the account thereby becomes overdrawn or any overdraft is thereby increased) all cheques and other orders up to a value of €5,000 bearing or purporting to bear a facsimile of the signature of the Bursar instead of such signature being written autographically, and that a specimen of such facsimile signatures be supplied to the Bank from time to time by letter in writing signed by the Bursar or the President of the University .





2. That the specimen of the Bursar's facsimile signature is as follows:

Sharon Bailey  
Bursar

I certify that this is a true copy of the Resolution passed at a meeting of Údarás na hOllscoile of University of Galway held on **18th December, 2023**.

Secretary for Governance and Academic Affairs: Date: 22/1/24

### Attachment 3

#### Banking Facilities - Resolution 3 - Electronic Fund Transmission System ("EFTS")

It was resolved that:

That in relation to the mandate under resolution dated the 18<sup>th</sup> December, 2023 (the "Mandate") furnished by the University, the Bank is hereby instructed to act on all instructions by the Parties named therein in relation to the operation of EFTS at the Bank's Information Technology Department within the authority limits specified in the said mandate.

I certify that this is a true copy of the Resolution passed at a meeting of Údarás na hOllscoile of University of Galway held on **18th December, 2023**.

Secretary for Governance and Academic Affairs: Date: 22/1/24

### Attachment 4

#### Banking Facilities - Resolution 4 - Fax, Telex or Verbal Instructions

It was resolved:

That in relation to the mandate under resolution dated 18<sup>th</sup> December, 2023 ("the Mandate") furnished by the University to the Bank in relation to the operation of any such account(s) the Bank is hereby instructed to act on all instructions in relation to the accounts, affairs or transactions of the University in strict accordance with Paragraph 2(c) of Attachment 1 of said mandate, notwithstanding that such instructions are received by facsimile message authenticated telex message or verbally by telephone.

I certify that this is a true copy of the Resolution passed at a meeting of Údarás na hOllscoile of University of Galway held on **18<sup>th</sup> December, 2023**.

Secretary for Governance and Academic Affairs: Date: 22/1/24



## Attachment 5

### Banking Facilities - Resolution 5 - Bank of Ireland's 'Business on Line' – Internet banking

It was resolved that:

1. The University be and is hereby authorised to use the Services being provided by the Bank and which will be accessed by the University and under which the University can at any time and from time to time have access to its accounts, financial information or other information or services capable of being accessed as a result of the University using the Services (or such lesser rights of access to account or financial information or their information or services as the case may be, as the Administrator may from time to time in his/her absolute discretion prescribe) and in addition under which the University can make transfers from or credits to other accounts wheresoever held, where so authorised by the Administrator, as prescribed by the Agreement.
2. Ciarán Ó hÓgartaigh, (President) and Professor Pól Ó Dochartaigh (Deputy President & Registrar) as ex officio members of the Údarás be and are hereby authorised to execute the Application in connection with the access and use by the University of the Services through Business on Line.
3. Adrian Burke, Director Financial Planning and Colette McGuinness, Head of Business Continuity and Enterprise Applications, ISS are hereby appointed as Administrators for the University (herein together referred to as the "Administrator"), as such term is defined in the Conditions of Use.

Administrators are authorised:

- (a) to confirm in writing to the Bank the identity of the Originating Accounts (as defined in the Conditions of Use) of the University in respect of which the Services will be provided as of the date of execution of the Agreement, together with the identity of the Nominated Account;
  - (b) to advise the Bank in writing from time to time of any change to deletion or addition to Originating Accounts of the University accessed through the Services; and
  - (c) to appoint 'authorised users' who can then use the functionality of the systems on a restricted basis.
  - (d) to perform the other functions identified in the Bank of Ireland Business on Line Agreement, as same may be amended or varied from time to time.
4. That any changes to the identity of the Administrator or either of them shall be notified to the Bank by the then Secretary of the University.

I certify that this is a true copy of the Resolution passed at a meeting of Údarás na hOllscoile of University of Galway held on 18<sup>th</sup> December, 2023.

Chairperson

Máire Gough

Secretary for Governance and Academic Affairs

Colette McGuinness